

From: **Albert P. Allan** alallan@allanipitigation.com
Subject: Re: La Michoacan Natural v. Maestre
Date: January 24, 2018 at 10:03 AM
To: Benjamin ben@mkglawfirm.com

AA

Ben,

We will consent to a 21-day extension of time for all defendants to respond to the complaint. This is not an informal extension, but is a formal agreement not to move for a default judgment during that time. Please be advised that we will oppose any further requests for extensions of time, and will note that we had already agreed to a previous extension if an additional extension is requested from the Court.

By my calculations, the defendants' answers are due today. Therefore, with this agreement, the defendants will have until February 14, 2018 to respond to the complaint.

Best regards.

Al Allan

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On Jan 23, 2018, at 2:56 PM, Benjamin <ben@mkglawfirm.com> wrote:

Good afternoon, apologies for the slow reply. The extension would be for 21 days, if you and co-counsel are agreeable to it. This would be for all defendants. Please let me know if this is acceptable. Thank you, Ben

Benjamin C. Karb
benjamin@mkglawfirm.com

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<image001.gif>

From: Albert P. Allan [<mailto:alallan@allanip litigation.com>]
Sent: Tuesday, January 23, 2018 2:48 PM
To: Benjamin <ben@mkglawfirm.com>
Subject: Re: La Michoacan Natural v. Maestre
Importance: High

Ben,

I have not heard back from you in answer to my questions. Please note that while I believe we can reach some accommodation, we have not agreed to any extension at the present time. Please let me know the answers to the questions posed previously and I will forward your response to lead counsel for review. I calculate that the defendants' deadline to answer is tomorrow, and unless you hear from us otherwise, there is no agreement on an extension.

I look forward to hearing from you at your earliest convenience. Thank you, and best regards.

Al Allan

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<image002.jpg>

On Jan 23, 2018, at 10:28 AM, Albert P. Allan <alallan@allanip litigation.com> wrote:

Ben,

I am acting as local counsel in the matter. I have forwarded your email to lead counsel, but I expect that we can reach some accommodation. How long an extension of time to respond does Mr. Maestre need, and are you asking only on behalf of Mr. Maestre, or all of the defendants?

Best regards.

Al Allan

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On Jan 23, 2018, at 9:18 AM, Benjamin <ben@mkglawfirm.com> wrote:

Good morning, I am hereby requesting, as a courtesy, an informal extension of time to answer the complaint filed by La Michoacana Natural on behalf of Luis Maestre. I am not entering an appearance on Mr. Maestre's behalf. I formerly represented Mr. Maestre in another matter unrelated to your client's claims, and he walked into my office yesterday with a copy of your lawsuit, although I am not sure whether he was served or how he obtained a copy. Mr. Maestre is not a native-born English speaker, and I am referring him to locate Spanish-speaking counsel immediately.

Please let me know if you will grant an informal extension to allow him to obtain alternate counsel. Thank you, and please do not hesitate to call me, Ben

Benjamin C. Karb
benjamin@mkglawfirm.com

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